

**THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ZEO HEALTH LTD.,	§	
MICAH PORTNEY,	§	
TOUCHSTONE LIFE ESSENTIALS,	§	
INC., and NORWOOD E. STONE,	§	Case No. 2:21-cv-11410(ES)(JCB)
	§	
Plaintiffs,	§	JURY TRIAL DEMANDED
	§	
vs.	§	
	§	
ZOI GLOBAL, LLC,	§	
LORI R. LEE, DENISE STEPHENS,	§	
METRON NUTRACEUTICALS,	§	
LLC, and NIKOLAOS	§	
TSIRIKOS-KARAPANOS,	§	
	§	
Defendants.	§	

DECLARATION OF ANYA ENGEL

I, Anya Engel, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am over twenty-one years of age and have personal knowledge of the following facts or access to information and/or records allowing me to confirm these facts.

2. I am an attorney with the law firm of Keyhani LLC and represent Plaintiffs Zeo Health, Ltd., Micah Portney, Touchstone Life Essentials, Inc., and Norwood E. Stone (collectively, “Plaintiffs”).

3. I submit this declaration in support of Plaintiffs' Motion for an Extension of Time to Effectuate Service of Process on Defendant Zoi Global and for Alternative Service via the Nevada Secretary of State.

4. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' email correspondence engaging Guaranteed Subpoena Service, a process server, on June 25, 2021 to serve process on Defendant Zoi Global, LLC ("Zoi Global") along with the other Defendants.

5. Attached hereto as Exhibit B is a true and correct screenshot of Defendant Zoi Global's corporate information on Nevada's business portal, SilverFlume, taken November 11, 2021. Nevada's business portal lists the address of Zoi Global's registered agent, Trevor Rowley, as 4730 S. FORT APACHE RD SUITE 300, Las Vegas, NV, 89147-7947. Also attached are true and correct screenshots taken from the Zoi Global website [www.zoiglobal.com/science/?u=well4life&r=C1167, <https://zoiglobal.com/compare-zoi-zeolites-vs-other-zeolites/?u=well4life&r=C1167>, and <https://zoiglobal.com/?u=well4life&r=C1167>], accessed November 4, 2021.

6. Attached hereto as Exhibit C is an affidavit of due diligence by Guaranteed Subpoena Service, dated August 2, 2021, detailing the process server's efforts to serve Zoi Global through its registered agent, Mr. Rowley.

7. Attached hereto as Exhibit D is an affidavit of due diligence by Guaranteed Subpoena Service, dated August 11, 2021, detailing the process server's efforts to serve Defendant Denise Stephens a/k/a Barbara D. Stephens.

8. Attached hereto as Exhibit E is an affidavit by Spartan Detective Agency, dated November 11, 2021, detailing the results of a skip trace for Mr. Rowley c/o Zoi Global.

Executed on: November 12, 2021

/s/ Anya Engel